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## UNITED STATES DISTRICT COURT

## DISTRICT OF NEVADA

NOEL C. MURRAY and DR. SWARNA PERERA, on behalf of themselves and all others similarly situated,

Plaintiffs,

v.

PROVIDENT TRUST GROUP, LLC, and ASCENSUS, LLC,

Defendants.

Case No.: 2:18-cv-01382-MMD-GWF

DECLARATION OF MICHAEL SLOCUM IN SUPPORT OF DEFENDANT PROVIDENT TRUST GROUP, LLC'S MOTION TO STAY DISCOVERY

- I, Michael Slocum, declare as follows:
- 1. I am an attorney duly licensed to practice law in the State of New Jersey and am counsel for Defendants Provident Trust Group, LLC, and Ascensus, LLC. My *pro hac vice* is forthcoming.
- 2. I make this declaration based upon my personal knowledge and pursuant to Local Rules IA 1-3(f) and 26-7.
- 3. On or about December 5, 2018, I met and conferred with Plaintiffs' counsel, Joshua Kohns, via telephone. Mr. Kohns and I discussed the possibility of the parties stipulating to stay discovery pending a ruling on Defendants' Motion to Dismiss (ECF No. 21).
- 4. Mr. Kohns indicated that Plaintiffs are not willing to stay discovery pending a ruling on the Motion to Dismiss.

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GREENBERG TRAURIG, LLP 10845 Griffith Peak Drive, Suite 600 Las Vegas, Nevada 89135 Telephone (702) 792-3973 Facsimile: (702) 792-9002 5. As such, despite a sincere effort to resolve or narrow the dispute during the meet-and-confer conference, the parties were unable to resolve or narrow the dispute without Court intervention.

I declare under penalty of perjury under the laws of the United States of America and the State of Nevada that the foregoing is true and correct.

DATED this 7 day of December 2018.

Michael J. Slocum, Esq. Pro Hac Vice Forthcoming 500 Campus Drive Suite 400 Florham Park NJ 07932 Attorneys for Defendants